REMARKS

The present application is generally directed to providing a method and system for enabling an invocation in a first notation to be made on an object described in a second notation without translating from the first notation to the second notation, the second notation not being the same as the first notation.

The Office Action also notes, in the course of allowing claim **21**, that the "prior art does not teach instantiating an object collection of objects corresponding to rules specifying the syntax of an object invocation and determining a set of objects sufficient to construct the object invocation."

I. **Amended Claims 11-20 Describe Computer Programs That Configure The Underlying Hardware To Provide A Desired Behavior, And Hence Constitute Statutory Matter**

The Office Action asserts that claims **11-20** are "functional descriptive material" and, thus, are non-statutory. Applicants have amended claims **11** and **17** to clarify that the subject matter of the claims is statutory. The remainder of claims **11-20** depend from claim **11** or claim **17**, and are also thus clarified by the present amendments. Consequently. applicants request that the rejection of claims **11-20** under 35 U.S.C. § 101 be withdrawn.

II. **The Gamma Reference's Teaching of the Builder Pattern is Inapplicable Because it Does Not Teach Manipulating Interfaces or Invoking Objects in a Second Notation from a First Notation**

Applicants respectfully submit that the Gamma reference (Gamma et al., Design Patterns: Elements of Reusable Object-oriented Software, pp. 97-106) cited by the Office Action is not germane to the present application.. Neither the Gamma Builder pattern nor the examples of the pattern described in the Gamma reference relate to accessing, storing, or manipulating objects defined in a foreign notation without translation. Rather, all of the objects described in the Gamma reference are written in a single notation, C++, and the

example described in the Motivation section (p.97) is specifically concerned with *translating* documents from one format to another.

Even if the Gamma reference were combined with APA, the result would not be the claimed invention, because nothing in the Gamma reference discloses or suggests how to modify APA accomplish the claimed invention. For example, CORBA relies on IDL to translate interfaces between programming languages, and nothing in the Gamma reference discloses or suggests how to use CORBA without IDL. Combining the Gamma Builder pattern with CORBA would not avoid the translation required by CORBA IDL.

Moreover, there is no motivation to combine the Gamma reference with APA. The examiner suggests that APA described at p. 2, lines 3-8 of the application suggest acquiring function/interface information during object construction/instantiation but lack a mechanism to do so. That is not the case. The APA referenced by the examiner uses the Java introspection mechanism or CORBA IDL stored in a CORBA Interface Repository to provide object definition information.

Further, the Gamma reference does not provide a mechanism for acquiring object definition information. The parser described in Gamma is used to parse a text document, not a software object with interfaces that may invoked. Gamma, at. 97-98. Although this distinction was inherent in the object definition limitations of the claims before the present amendment, the claims have been amended to clarify this point.

Applicants respectfully request that the rejection of independent claims 1, 7, 11, 17 and all of the claims dependent upon them be withdrawn in view of the failure of the cited art to teach all of the limitations in each of the aforementioned claims.

CONCLUSION

Entry of the foregoing remarks into the file of the above-referenced patent application is respectfully requested. Applicants believe that each ground for rejection has been

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successfully overcome and that the claims are in condition for allowance. If any issues

remain in connection with this application, applicants encourage the Examiner to call the

undersigned at (800) 760-9090.

Respectfully submitted,

Date: February 12, 2002   By: _____

Garland T. Stephens   37,242
PENNIE & EDMONDS LLP   (Reg. No.)
1155 Avenue of the Americas
New York, New York 10036-2711
(212) 790-9090